

LADAH LAW  
FIRM

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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

JESSE CRUZ, an Individual; MARIA CRUZ,  
an Individual; GEOVANY MARTINEZ, an  
Individual,,

Plaintiffs,

vs.

DANNY DURBIN, an Individual;  
CHAMPION TRANSPORTATION  
SERVICES, INC., a foreign corporation;  
CHAMPION LOGISTICS GROUP, INC., a  
foreign corporation; DOES I through XX,  
inclusive; and ROE BUSINESS ENTITIES I  
through XX, inclusive,

Defendants.

Case No.: 02:11-cv-00342-LDG-VCF  
Consolidated:  
2:12-cv-00051  
2:12-cv-01627

**STIPULATION AND ORDER TO  
CONTINUE DEADLINE FOR REPLIES  
TO DISPOSITIVE MOTIONS  
(Second Request)**

AND ALL OTHER RELATED ACTIONS.

Pursuant to F.R.C.P. 6, and Local Rules 6-1, 6-2, and 7-1, the parties, by and through their undersigned attorneys of record, stipulate to a 14 day extension to the deadlines set for replying to dispositive motions. The current reply deadline is July 16, 2015. The proposed deadline for replies shall be extended to July 30, 2015.

All the remaining parties in this case have stipulated to the extension.

Pursuant to F.R.C.P. 6(b)(1), good cause exists for the extension because counsel for Plaintiffs, Jesse Cruz, Maria Cruz and Geovany Martinez, have been unable to meet the current reply deadline due to scheduling conflicts with a two week trial that is currently ongoing.

Counsel for Plaintiffs has conferred with the remaining parties in this case and none have objected to the extension.

In addition, there is no prejudice or any known conflict with potential trial dates.

DATED this 16<sup>th</sup> day of July, 2015.

DATED this 16<sup>th</sup> day of July, 2015.

**LADAH LAW FIRM**

**ROSENGARTEN & ASSOCIATES**

*/s/ Ramzy P. Ladah, Esq.*

*/s/ Ronald D. Rosengarten, Esq.*

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*Jesse Cruz, Maria Cruz & Geovany Martinez*

*Attorneys for Intervenor*

*Imperium Insurance Co.*

DATED this 16<sup>th</sup> day of July, 2015.

DATED this 16<sup>th</sup> day of July, 2015.

**STEPHENSON & DICKINSON**

**MCDONALD CARANO WILSON**

*/s/ Michael E. Hottman, Esq.*

*/s/ Craig A. Newby, Esq.*

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**ORDER**

Based upon the foregoing Stipulation, IT IS SO ORDERED.

DATED this 20 day of July, 2015.

  
DISTRICT COURT JUDGE  
LLOYD D. GEORGE

Respectfully submitted by:

**LADAH LAW FIRM**

*/s/ Ramzy P. Ladah, Esq.*

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